

- c) ROMERO had recently heard from Individual A that Individual A was recruiting individuals for the commission of a terrorist attack on United States soil;

In violation of Title 18, United States Code, Section 1038(a).

COUNT TWO

The SPECIAL SEPTEMBER 2005 GRAND JURY further charges:

On or about June 15, 2005, at Cook County, in the Northern District of Illinois,
Eastern Division,

GILBERT ROMERO,

defendant herein, did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the FBI, an agency within the executive branch of the Government of the United States, in that defendant falsely stated and represented during an interview with a Special Agent of the FBI, in substance, that:

- a) ROMERO had learned that Individual B had access to bomb-making materials because Individual B used to live on a farm;
- b) ROMERO knew that Individual B had made bombs in the past; and
- c) ROMERO had learned from Individual B that Individual B knew how to make a bomb in a car using brake fluid and chlorine tablets and would provide these materials to ROMERO in exchange for drugs;

In violation of Title 18, United States Code, Section 1001(a)(2).

COUNT THREE

The SPECIAL SEPTEMBER 2005 GRAND JURY further charges:

On or about June 29, 2005, at Cook County, in the Northern District of Illinois, Eastern Division,

GILBERT ROMERO,

defendant herein, did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the FBI, an agency within the executive branch of the Government of the United States, in that defendant falsely stated and represented during an interview with a Special Agent of the FBI, in substance, that:

- a) ROMERO was a principal participant, together with Individuals A, B, C and D, in the planning to blow up the headquarters of Company A;
- b) ROMERO and the other participants in the terrorist plot planned to finance their operation by either using the proceeds from a pending medical malpractice lawsuit involving ROMERO's mother or by holding currency exchange and jewelry store owners hostage to extort ransom money from their families;
- c) The plan to blow up the headquarters of Company A was to be executed by loading a truck with 55 gallon drums that would be filled with ammonium nitrate and diesel fuel and detonating the explosives by sending a signal from a cellular phone;
- d) The participants in the terrorist plot would be armed with AK-47 and Mac-10 machine guns which would be supplied by ROMERO's street gang, and the participants in the terrorist plot would be directed to use the machine guns to shoot any police officers that interfered with the plan; and
- e) ROMERO had spoken to Individual A recently and Individual A had stated

that he had not had any change of heart about moving ahead with the terrorist plot.

In violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY